

Subject: EASA Operations Rulemaking

Meeting: OPS.001 Rulemaking Group Meeting May 15 & 17, 2007 and Non-commercial Operations Sub-group Meeting May 15 & 16, 2007

File: EASA

Reported by: Ray Rohr

Summary:

The OPS.001 Rulemaking Group met on May 15 & 17 to review progress in the sub-groups and address open issues. The Group was advised that the effort to resolve the outstanding issues and approve the EASA Extension of Scope during the German Presidency which ends June 30, 2007, had not been successful. As a result, resolution of the Extension of Scope will be undertaken by the Portuguese Presidency which runs from July 1 to December 31, 2007. Consequently, it will be at least the end of March 2008 before EASA can issue the OPS NPA.

The **Commercial Sub-group** reported that all of the aeroplane and helicopter provisions have been reviewed and final drafting is underway. The commercial balloon requirements have been reviewed and will be finalized at the June meeting. The Sub-group is working with the Aerial Work Sub-group on the question of sightseeing flights. The Powered Airship rules and SAR rules will be left as future tasks to be undertaken by EASA.

The **Aerial Work Sub-group** advised that they finalizing the aerial work implementing rules and are working on Certification specifications for sightseeing flights. Issues still under review include:

- Oxygen requirements of parachuting operations,
- Carriage of dangerous goods used in aerial work operations,
- Training requirements, and
- Regulatory impact analysis.

The **Authority & SMS Sub-group** reported that the implementing rules and AMC material for all management systems have been completed. They will be working on the implementation procedures for the non-commercial rules and aerial work plus the operations inspector guidance material at the June meeting

At the eighth meeting of the **Non-Commercial Operations with Complex Motor-Powered Aircraft Sub-group** a number of issues were addressed. The [meeting agenda](#) is linked to this report. A major item of consideration was the issue of certification requirements for fractional ownership operations and for aircraft management companies. The discussion paper [Regulation of Non-commercial Operations Involving Fractional Ownership and Management Companies](#) drafted by Ray Rohr, was reviewed. In the review and discussions with EASA legal staff it was noted that the definition of commercial operation contained in both the Commission and Council proposals does not differentiate between fractional ownership operations and any other form of managed operations. Consequently, it would appear that the rules applicable to fractional ownership operations and other forms of managed operations will have to be the same. It was agreed that the paper would be revised based on the Sub-group discussion and it and the associated implementing rules would be finalized at the June meeting.

Items on review of declaration draft requirements and the FTL working paper were deferred to the June meeting. The remainder of the issues on the agenda were completed and the material that was reviewed was accepted with minor amendments. The draft [minutes of the meeting](#) are linked to this report.

The next OPS.001 Rulemaking Group and Non-Commercial Operations Sub-group meetings are on June 26 - 28, 2007.

Implication for Business Aviation:

This is a very important ongoing project with a number of issues that must be resolved. Fortunately progress to date has been positive.

Decisions Required:

Nil at this time.

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European Aviation Safety Agency

TASK OPS.001

SUBGROUP

NON-COMMERCIAL OPERATIONS WITH COMPLEX MOTOR-POWERED AIRCRAFT

8TH MEETING

15 May 10:30 h – 16 May 16:00 h, 2007

EASA PREMISES, COLOGNE

PROPOSED AGENDA

1. Adoption of Agenda
2. Review of minutes of 24 & 25 April 2007 meeting
3. Review of WP on management specifications
4. Review of comments on cabin crew rules
5. Review of WP OM template for small operations
6. Review of Declaration draft requirements and AMC/GM material
7. Review of WP on FTL
8. RIA considerations
9. AOB

Discussion Paper

Regulation of Non-commercial Operations Involving Fractional Ownership and Management Companies

1. Issue

To develop for Ops Part 2 the regulatory provisions and associated guidance material for the regulation of non-commercial operations involving fractional ownership and management companies.

2. Background

In the Commission proposal of 15.11.2005 to amend Regulation (EC) No. 1592/2002 commercial operation is defined as:

“a remunerated aeronautical activity covered by a contract between an operator and a customer, where the customer is not, directly or indirectly, an owner of the aircraft used for the purpose of this contract and the operator is not, directly or indirectly, an employee of the customer.”¹

Article 6b.3 of the Commission proposal states:

“Operators engaged in the non-commercial operation of complex motorpowered aircraft shall declare their capability and means to discharge the responsibilities associated with the operation of the aircraft.”²

It has been proposed by the Permanent Representatives Committee of the Council of the European Union that commercial operation be defined as:

“any operation of an aircraft, against remuneration or other valuable consideration, which is available to the public or, when not made available to the public, which is performed under a contract between an operator and a customer, where the latter has no control over the operator”.

They also recommended that Article 6.b.3 be amended to read as follows:

***“Unless otherwise determined in the implementing rules,** operators engaged in the non-commercial operation of complex motorpowered aircraft shall declare their capability and means to discharge the responsibilities associated with the operation of the aircraft.”³*

The definition of commercial operation contained in the Commission proposal would unquestionably result in operations where an owner contracts a management company to operate an aircraft on his/her behalf being classified as non-commercial when the operation is being conducted for the benefit of the owner and there is no remuneration other than the operating contract involved.

This definition would also appear to classify fractional ownership operations as non-commercial when the owner of a fractional share of an aircraft is being provided with air transport services as long as:

- the aircraft in which the owner owns a fractional share is used, or
- an agreement on dry lease and exchange of aircraft between all of the fractional share owners exists and an aircraft within the program is used.

The definition of commercial operation proposed by the Council would not appear to alter that situation.

On that basis, the Authority Requirements and SMS Sub-group and the Non-commercial Operation with Complex Motor-powered Aircraft Sub-group of the OPS.001 Rulemaking Group met and

¹ Proposal for a Regulation of the European Parliament and the Council amending Regulation (EC) No 1592/2002 of 15 July 2002 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, Commission of the European Communities, Brussels 15.11.2005

² Ibid

³ COREPAR Report to Council on Amendment of (EC) No 1592/2002 of 15 July 2002, Council of the European Union, Brussels, 30.11.2006

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discussed options for the declaration process and regulatory oversight of operations which involved a management company. They specifically explored options for situations such as:

- fractional ownership operations, and
- operations where an owner of an aircraft contracts with a management company to maintain and operate the aircraft on his behalf and solely for his benefit.

After discussion of a range of options it was agreed that the ***Consolidated Recommendations of the ECAC Task Force on Fractional Ownership*** of 24 January 2007 presented a sound framework for regulation of fractional ownership operations and that the principles contained in it should be used as a basis of the development of the EASA OPS Part 2 rules.

Some members of the Sub-groups expressed the opinion that owners of aircraft who entered into contracts with management companies no longer retained accountability for the safety of the operation of that aircraft and in fact became innocent customers of the management company, similar to customers of a commercial operator. Some members of the Sub-groups also expressed the concern that both definitions of commercial operation contained “loopholes” that would permit aircraft operators to conduct illegal charters through the use of contractual arrangements. This issue is discussed in the ***Discussion paper on certification versus declaration for operations with non-commercial complex aircraft*** that was previously presented the Non-commercial Sub-group. On that basis it was concluded that the application of similar certification arrangements for operations involving aircraft management companies should be considered.

3. Discussion

3.1 ECAC Task Force and Fractional Ownership Considerations

The ECAC Task Force on Fractional Ownership was composed of representatives from the European Commission, EASA and the European aviation industry. Their year long study addressed the safety aspects, security measures and consideration of the nature of Fractional Ownership operations. The Task Force concluded “*that any new regime adopted in this area would require to give these operations a degree of flexibility that business operations need in order to be efficient.*”⁴ They also noted that “*the industry representatives have pointed out in this regard that should European operators be required to hold an AOC that would greatly impinge on the European industry’s ability to compete internationally.*”⁵

In their recommendations the Task Force noted that as a first step there must be agreement on the definition of fractional ownership. They recommended that a Fractional Ownership program would be any ownership and aircraft exchange program that encompassed all of the following elements:

- a. The provision of services for management of the programme by a single programme manager acting on behalf of the owners;
- b. The availability of two or more aircraft for services;
- c. One or more owners per aircraft belonging to the programme, with at least one aircraft having more than one owner;
- d. Each owner owning a minimum percentage (to be determined) in at least one of the programme’s aircraft;
- e. An agreement on dry lease exchange of aircraft between all the owners;
- f. Multi-annual agreements between participants in the programme, defining conditions with regard to ownership, management of the programme and exchange of aircraft between owners;
- g. An explicit statement in an appropriate legal framework that the operation of a Fractional Ownership programme falls under the **private non-commercial transport** category would be required, as would be an indication that part-owners in a Fractional Ownership programme

⁴ Special ECAC Task Force to Consider Fractional Ownership, Summary of Recommendations adopted by Directors General, European Civil Aviation Conference, Brussels 24.01.2007

⁵ Ibid

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- are in operational control of the programme aircraft, and must delegate all or part of the tasks associated with the operation of the aircraft to the Programme Manager;
- h. A clear statement would be required that transport of passengers or goods or any operation for remuneration or hire under such a programme is prohibited;
 - i. A prohibition on the sale or lease of an aircraft interest that is less than the “minimum Fractional Ownership interest” unless the flights associated with that interest are operated under a commercial regime by a certified and licensed air carrier; and
 - j. A requirement that passengers on a Fractional Ownership flight must be “designated” by the relevant owner.⁶

The Task Force also recommended that the European safety regulatory requirements for fractional operations should require safety standards similar to those applied to commercial operations but without the need for an air operator certificate.⁷

With regard to the operational control issue the Task Force recommended the following principles should be included in the regulatory regime:

- a. Operational tasks shall be delegated mandatorily to the Programme Manager and shall be listed. The Fractional Owner continues to be jointly and individually responsible for the performance of these tasks and for compliance with applicable regulations and requirements;
- b. The Programme Manager shall be the sole point of contact with national authorities for specifications, approvals and authorisations required by all national or European regulations pertaining to Fractional Ownership Operations for the tasks delegated by the Fractional Owner. These specifications, authorisations and approvals should not be affected by any change in ownership of a programme aircraft in the identified programme;
- c. The Fractional Owner shall formally acknowledge his/her responsibilities in the Programme Management contract, indicating that he/she has read, understood and accepted operational control responsibility. The Fractional Owner shall also acknowledge that he/she is in operational control over programme aircraft when the Fractional Owner uses another programme aircraft through the dry lease interchange agreement;
- d. Arising from the fact that Fractional Owners are signatories to a dry lease interchange agreement which is an essential element of a Fractional Ownership programme, Fractional Owners retain two areas of responsibility as follows:
 - i. As the owner, he/she is responsible for his/her own aircraft irrespective of its use by any other owner from the programme;
 - ii. As the member of the programme, he/she is responsible for any aircraft he/she operates from the aircraft pool.⁸

The foregoing conditions parallel the requirements of FAR Part 91 Sub-part K, the rules that govern fractional ownership operations in the United States. They appear to be appropriate for European application with one minor exception. The provision contained in item “g” of the elements of a fractional ownership program stating that there must be an indication that the part-owners in a fractional operation program are in “operational control” is required in the US context because of their definition of commercial operator, but given the definition of commercial operation contained in the Commission proposal of 15.11.2005 and in the Council proposal, if all of the other elements are in place it would appear that this requirement would not be necessary. Accordingly, it would appear that it is not necessary to include in the OPS Part 2 rules the operational control provisions used in FAR Part 91 K and recommended by the Task Force. It would also appear that the rules could be constructed so as to ensure a clear boundary between permitted fractional ownership operations and illegal charter operations.

⁶ Ibid

⁷ Ibid

⁸ Ibid

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3.2 Managed Operations Considerations

It would also appear to be possible to construct the rules related to managed operations so that the boundary is clear. These rules could use the following principles;

- The aircraft is managed under a long term management contract,
- The contract is with an aircraft management services company selected by the owner,
- The aircraft is owned by a sole owner,
- The management contract is specifically of for the provision of operational services for the owner's aircraft,
- The aircraft is solely or mainly used by the owner for the carriage of himself and persons or goods designated by the owner,
- There is no remuneration or other valuable consideration related to the carriage of persons or goods.

It follows that where a substitute aircraft is provided these criteria will not be satisfied and the operation should, therefore, be classified as a commercial operation.

4. Proposed Regulatory Provisions

Based on the foregoing, it would appear that there are four options that must be considered with regard to the regulation of non-commercial operations conducted by fractional ownership operations and those involving management companies.

1. No requirements other than a declaration by the operator of their capability and means to discharge the responsibilities associated with the operation of the aircraft, as is provided for in the Commission proposal.
2. Certification of fractional ownership operations and declaration for operations involving management companies with the rules related to management companies to include provisions similar to those identified in section 3.2.
3. Certification of both fractional ownership operations and operations involving management companies through an aircraft management operator certificate.
4. The requirement that fractional ownership operations and operations involving management companies must be conducted under an air operator certificate similar to that required under OPS Part 1.

5. Regulatory Impact Assessment

As noted in section 2 of this Discussion Paper, Article 6b.3 of the Commission proposal as amended by the Council states:

“Unless otherwise determined in the implementing rules, operators engaged in the non-commercial operation of complex motorpowered aircraft shall declare their capability and means to discharge the responsibilities associated with the operation of the aircraft.”⁹

Therefore, any requirement beyond the basic declaration requirement must be justified through a regulatory impact assessment (RIA). This RIA will assess the four options for the regulation of non-commercial operations conducted by fractional ownership operations and operations involving management companies with complex motor-powered aircraft as identified in section 4 of this paper.

5.1 Option 1 – Declaration

The following RIA is in point form and is very conceptual. Suggestions of points to be included and how best to structure the RIA would be appreciated.

⁹ COREPAR Report to Council on Amendment of (EC) No 1592/2002 of 15 July 2002, Council of the European Union, Brussels, 30.11.2006

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Safety

- With only limited regulatory oversight there is some risk that fractional ownership program managers could engage in operations without meeting the requirements of OPS Part 2 for some time without being detected. As all fractional operations in Europe are now conducted under a commercial air operator certificate, this may be considered a reduction in the level of safety only when operators choose to operate under non-commercial rules rather than commercial.
- Given that managed operations are common in North America and Europe, and have been conducted without requirement for of any type of certificate, and that there have not been identified safety problems, it would appear that this is not a significant safety concern with this segment of aviation.

Economic

- No economic impact as a declaration is required for such operations by the Essential Requirements.

Environmental

- No environmental impact.

Social

- No social impact

Other aviation requirements

- No impact on other aviation requirements.

Foreign comparable regulatory requirements

- The requirements for fractional ownership operations would be less than the requirements in the USA. This could have a negative impact on efforts to ensure a level playing field between US and European operators.
- The provision for managed companies would be compatible with international Standards and Recommended Practices.

Equity and fairness issues

- There are no equity and fairness impacts.

5.2 Fractional Ownership Operator Certificate and Additional Requirements for Management Companies

Safety

- The requirements for fractional operations program managers to hold a Fractional Ownership operator certificate would ensure a reasonable level of safety for aircraft owners who are not fully aware of the regulatory and safety responsibilities associated with aircraft ownership and operation and their fellow passengers. Given that fractional ownership operations are more

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complex than other non-commercial operations, some additional oversight may be justified even though the safety record of this aviation segment is excellent.

- Concern has been expressed that an owner who enters into a contract with a management company becomes an innocent customer. In such arrangements the owner has a choice of management companies, and given that he is the sole owner of the aircraft, he is in control of the contract. The concern that the owner may become an innocent customer can be resolved by including regulatory provisions similar to those suggested in section 3.2 of this paper into the declaration required for aircraft management companies. This follows the principle that owners must assume a greater self responsibility for their own safety in non-commercial operations.
- Management companies have demonstrated over the years a very high attention to safety, resulting in an excellent safety record. Therefore, there is no demonstrated rationale to increase the regulatory oversight of this aviation segment.

Economic

- The fractional ownership program managers would incur the costs associated with meeting the initial fractional ownership operator certificate issue requirements and in some States the cost associated with ongoing regulatory surveillance. These costs would be passed on to the aircraft owners. Given that fractional operators in Europe have generally operated as commercial entities, there is not likely to be a big cost impact on the companies to have a fractional ownership operating certificate.
- As this is a new requirement there would be financial cost to NAAs if fractional ownership operations are established in their State.

Environmental

- No environmental impact.

Social

- No social impact

Other aviation requirements

- No impact on other aviation requirements.

Foreign comparable regulatory requirements

- This proposal parallels the requirements in the USA and could help in achieving a level playing field between US and European operators.
- It is also the option recommended by the ECAC Task Force on Fractional Ownership operations.
- The proposal parallels the ICAO concept for modernizing Annex 6 Part II for International General Aviation Aeroplanes and thus promotes worldwide harmonization.

Equity and fairness issues

- There are no equity and fairness impacts.

5.3 Option 3 – Aircraft Management Operator Certificate for Both Fractional Ownership and Management Companies

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Safety

- The requirements for fractional operations program managers and other aircraft management companies to hold an aircraft management operator certificate would ensure the same level regulatory safety oversight for both fractional owners and those who are sole owner of an aircraft. As noted previously, those sole owners have the freedom of choice of aircraft management companies and if there are not satisfied with the level of safety of one aircraft manager they can terminate the agreement and chose another, whereas the fractional owner does not have that option. The option does not recognize the increased level of operational complexity of fractional ownership compared to management companies. Therefore, this requirement is more than is required to provide an acceptable level of safety oversight.
- There may be a risk that faced with additional regulatory burden some existing aircraft management companies would withdraw from the market which could in fact result in a degradation of safety.
- The safety record of management companies has been excellent, so there is little rational, or safety case to be made, for increasing regulatory provisions.

Economic

- Under this option the fractional ownership operators and aircraft management companies would incur the costs associated with meeting the initial aircraft management operator certificate issue requirements and in some States the cost associated with ongoing regulatory surveillance. These costs would be passed on to the aircraft owners.
- As this is a new requirement and it is anticipated that there would be a significant number of management companies that would require certification, this option will result in a significant new cost to NAAs.

Environmental

- No environmental impact.

Social

- No social impact

Other aviation requirements

- No impact on other aviation requirements.

Foreign comparable regulatory requirements

- This proposal exceeds the regulatory requirements in the US and those contained in the proposed amendment to Annex 6 Part II. The additional requirements placed on European operators would put the operators at an economic disadvantage with operators in other areas of the world.

Equity and fairness issues

- The introduction of a new requirement for aircraft management companies to be certificated where no safety concern has been identified could be construed as unfair.

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5.4 Option 4 – Air Operator Certificate for Both Fractional Ownership Operators and Management Companies

Safety

- Requiring an air operator certificate would ensure an equivalent regulatory safety oversight for non-commercial operations as is provided for commercial operators.
- This level of safety oversight would be far in excess of that applied to non-commercial operations in other areas of the world and contrary to international standards established by ICAO. This option does not recognize the safety responsibilities of the owner which is a fundamental principle for regulating non-commercial operations in the international Standards and Recommended Practices.
- There appears no justification for imposing costly new regulatory provisions on an industry that has an excellent safety record.

Economic

- The fractional ownership program managers and aircraft management companies would incur substantial costs associated with meeting the initial air operator certificate issue requirements and the cost associated with ongoing regulatory surveillance.
- These costs could have a very significant negative impact on this non-commercial aviation sector. There would also be significant cost increases to NAAs.

Environmental

- No environmental impact.

Social

- There could be significant negative social impact if this non-commercial aviation sector were subjected to significant contraction.

Other aviation requirements

- The requirement for an air operator certificate would be anomalous to other aviation regulatory requirements in Europe.

Foreign comparable regulatory requirements

- The requirement for an air operator certificate is significantly in excess of the requirements in the USA and in international Standards and Recommended Practices and would have a detrimental effect in efforts to achieve a level playing field.

Equity and fairness issues

- The requirement for an air operator certificate for non-commercial operations would be unfair to owners and inequitable to other similar non-commercial activities.

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6. Conclusions and Recommendations

Needs to be further developed.

Based on the considerations discussed in the RIA it would appear appropriate that a requirement be included in OPS Part 2 for a rudimentary certification process for non-commercial fractional ownership operations and that non-commercial operations involving management companies be subjected to declaration requirements like other non-commercial operations conducted by the owners of aircraft.

It would also appear to be appropriate that the certification requirements for fractional operations generally follow the principles contained in FAR Part 91 Sub-part K.

It is recommended that this course of action be accepted by the Authority Requirements and SMS Sub-group and the Non-commercial Operation with Complex Motor-powered Aircraft Sub-group of the OPS.001 Rulemaking Group and that the associated regulatory requirements and guidance material be developed.

European Aviation Safety Agency

TASK OPS.001 RULEMAKING GROUP

SUBGROUP NON-COMMERCIAL OPERATIONS WITH COMPLEX MOTOR-POWERED AIRCRAFT

MEETING MINUTES OF

15 MAY 2007, 10.30 H – 16.00 H

16 MAY 2007, 08.30 H – 11:45 H

EASA PREMISES, COLOGNE

Attendees:

Karl Brady (KBR), ECA
Douglas Carr (DCA), GAMA
Mike Hamlin (MHA), ECOGAS (15/05)
Josef Maurer (JMA), ETF
Dick Nederlof (DNE), CAA Netherlands
Geoff Parker (GPA), UK CAA
Jacob T. Pedersen (JTP), IAOPA
Marco Pereira (MPE), Netjets (observer)
Ray Rohr (RRO), EBAA
Daniela Defossar (DDE), EASA Rulemaking Officer
Betty Lecouturier (BLE), EASA Rulemaking Officer (15/05 afternoon)

1. The subgroup reviewed the proposed agenda. The review of the FTL WP and declaration requirements and associated AMC/GM material was deferred to the next meeting. An agenda item cabin crew to review GPAs comments was added. The agenda was adopted with these changes.

2. RRO briefed the subgroup on the core group pre-briefing mentioning the latest developments in the legislative process and the discussion on certification of commercial A to A flights.

3. The minutes of the last meeting and action item list were reviewed. The meeting minutes were adopted without further changes.

4. The subgroup discussed the WP on the certification of management companies. RRO had re-drafted the paper to distinct between a certification of a fractional ownership programme management comparable to FAR 91K and no certification requirement for management organisations managing the aircraft on behalf of one aircraft owner. The subgroup had a long discussion whether or not this distinction could be made and how certification could be addressed. The good safety record of operations involving management organisations was mentioned and therefore the difficulty to justify any form of certification. However, in the situation of fractional ownership operations where the owners may have limited influence on the operation, it was agreed that there may be some

justification for certification. It was also thought that this would establish one level of safety between the US and Europe. Some group members voiced concerns as the ownership is not the determining factor but the question on who has operational control. It was finally agreed that the management organisation in reality has operational control of the operation and a distinction between fractional ownership programme management and management organisations managing the aircraft on behalf of one aircraft owner could not be made. It was recognised as well that the owner always keeps some responsibilities. It was also noted that the definition of commercial operation in both the Commission and Council proposals does not differentiate between fractional ownership operations and any other form of managed operations. Consequently, it was agreed that the rules applicable to fractional ownership operations and other forms of managed operations will have to be the same.

One alternative is to have the management organisation subject to prior approval similar to the FAR 91K management specification, and the second is a declaration for these operations as is proposed for other non-commercial operations. RRO will re-draft the working paper and distribute it to subgroup members. Subgroup members are asked to develop the RIA further. In the paper "management organisation" will be defined as "any legal or natural person operating or proposing to operate the aircraft on behalf of the aircraft owner".

5. The subgroup discussed GPAs comments on the cabin crew requirements and AMC/GM. Paragraphs on number and composition of cabin crew, familiarisation and checking were changed. DDE was asked to follow up on these changes and finalise the wording. BLE will check with certification experts on the requirements for an emergency evacuation demonstration in case of STCs.

6. The subgroup discussed the OM template presented by JTP. The template is based on JAR-OPS 1 Subpart P adapted to small non-commercial operations and takes into account elements of the CAME. Subgroup members agreed that the template should be considered as guidance material containing a short description on the contents similar to the CAME. However, the level of detail will be brought to the core group for discussion and coordination with other subgroups. Regarding FTL, DCA will provide further guidance material. The FTL text should then be moved to FTL AMC/GM. For the work on the chapter descriptions, JTP will allocate chapters to subgroup members for review and drafting. It was decided at the meeting that RRO addresses the management system and DCA security.

7. The subgroup was asked to review Subpart N of the OPS-FCL task force and to send any comments to DDE before the end of May.

ACTION LIST

No.	Meeting No. / Date	Task	Resp.	Timeframe	Status
1.	1 09/11/06	Presentation on IS-BAO	RRO	Meeting 23 28-29/11/06 12-13/12/06	c
2.	1 09/11/06	Circulate meeting documentation of last meeting of the ECAC Task Force on fractional ownership	DDE	asap	c
3.	1 09/11/06	Put link to FAR 91 Subpart K on circa website	DDE	asap	c
4.	1 09/11/06	Prepare WP on the basis of JAR-OPS 0 and 2	RRO+ DDE	Meeting 2 28-29/11/2006	c
5.	2 28-29/11/06	Distribute copy of ICAO Annex 6 Part II proposal	RRO	asap	c
6.	2 28-29/11/06	NBAA Management Guide to be put on circa	DDE	asap	c
7.	2 28-29/11/06	Presentation on FAR 91K and on ICAO discussions when drafting the proposal Annex 6 II regarding fractional ownership	DCA	Meeting 4 9-10/01/2007	c
8.	2 28-29/11/06	Check ICAO SARPs for approval requirements	DDE	asap	c
9.	2 28-29/11/06	Conduct RIA on requirements regarding determination of mass	Group	Meeting 3 12-13/12/2006 See action item 11.	c
10.	2 28-29/11/06	Review JAR-OPS 1 Subparts	GPA, DCA, DDE, JTP, JMA	Meeting 3 12-13/12/2006	c
11.	3 12-13/12/06	Review draft JAR-OPS 2 Subpart J and draft a proposal for the OPS 2 rule	RRO	Meeting 4 09-10/01/2007	c
12	3 12-13/12/06	Clarify "equivalent standard" to FCL	DDE	Meeting 4 09-10/01/2007	c

No.	Meeting No. / Date	Task	Resp.	Timeframe	Status
13	3 12-13/12/06	Redraft OPS 2 requirements regarding the content and structure of an OM	RRO	Meeting 4 09-10/01/2007	c
14	3 12-13/12/06	Review EU-OPS Subpart Q and draft proposal for OPS 2; present FTL schemes	RRO	Meeting 4 09-10/01/2007	c
15	3 12-13/12/06	Circulate IS-BAO checklist for guidance material	RRO	asap	c
16.	3 12-13/12/06	ICAO cross reference list	DDE	Meeting 45 09-10/01/2007 13-14/02/2007	c
17.	4 09-10/01/07	Forward request on additional membership to core group	RRO	asap	c
18.	4 09-10/01/07	Address the issue of legal charter within the non-commercial rules to core group	RRO	asap	c
19.	4 09-10/01/07	Draft requirements on fractional ownership based on FAR 91 K	DCA/ DDE	Meeting 5 13-14/02/2007	c
20.	4 09-10/01/07	Cosmic radiation detection equipment: check EU Directive	DDE	Meeting 56 13-14/02/2007 13-14/03/2007	c
21.	4 09-10/01/07	Internal doors and curtains: check against CS	KBA	Meeting 5 13-14/02/2007	c
22.	4 09-10/01/07	1.795 Crash axes and crowbars: source	All	Meeting 57 13-14/02/2007 24-25/04/2007	c
23.	4 09-10/01/07	M&B WP: incorporate comments for next meeting	RRO/ DDE	Meeting 5 13-14/02/2007	c
24.	4 09-10/01/07	OM WP: incorporate comments for next meeting	RRO/ DDE	Meeting 5 13-14/02/2007	c
25.	4	FTL WP:	RRO/	Meeting 5	c

No.	Meeting No. / Date	Task	Resp.	Timeframe	Status
	09-10/01/07	incorporate comments for next meeting	DDE	13-14/02/2007	
26.	4 09-10/01/07	Security WP: incorporate comments for next meeting	RRO/ DDE	Meeting 5 13-14/02/2007	c
27.	5 13-14/02/2007	Draft WP on cabin crew	RRO	Meeting 6 13-14/03/2007	c
28.	5 13-14/02/2007	Check CS 23 regarding the means for emergency evacuation	KBA	Meeting 6 13-14/03/2007	c
29.	5 13-14/02/2007	Review Declaration WP for next meeting	All	Meeting 6 13-14/03/2007	c
30.	5 13-14/02/2007	Forward paragraph on SOP to authority subgroup to consider for SMS	DDE	asap	c
31.	5 13-14/02/2007	Draft requirements for OPS 2 according to discussion on ICAO cross reference list	DDE	Meeting 6 13-14/03/2007	c
32.	5 13-14/02/2007	Draft WP on operations with involvement of management companies	GPA/ JTP	Meeting 6 13-14/03/2007	c
33.	5 13-14/02/2007	Draft WP on DG	DDE	Meeting 6 13-14/03/2007 24-25/04/2007	c
34.	6 13-14/03/2007	Forward Declaration WP and WP on operations involving management companies to Authority Subgroup and request joint meeting for April	DDE	asap	c
35.	6 13-14/03/2007	Insert cabin crew WP into OPS 2	DDE	Meeting 7 24-25/04/2007	c

No.	Meeting No. / Date	Task	Resp.	Timeframe	Status
		template			
36.	6 13-14/03/2007	Part OPS 2 template: reflect subgroup discussions; check requirements against ER; prepare a cross reference with ICAO Annex 6 III helicopter general aviation	DDE	Meeting 7 24-25/04/2007	c
37.	6 13-14/03/2007	Preview and prepare AMC/GM material	RRO/ DCA/ GPA/ KBR/ JTP/ DNE/ DDE	Meeting 7 24-25/04/2007	c
38.	6 13-14/03/2007	Invite Mr. Marco Pereira, Netjets for April/May meeting	DDE	Meeting 7 24-25/04/2007	c
39.	7 24-25/04/2007	Prepare WP for management specification	RRO	Meeting 8 15-16/05/2007	c
40.	7 24-25/04/2007	Draft requirements and AMC/GM material for authorities and OPS 2 Part based on the 2 WP from the non-commercial subgroup	LCR/ DDE	Meeting 8 15-16/05/2007 Meeting 9 26-27/06/2007	o
41.	7 24-25/04/2007	Review Canadian GM material for use as AMC/GM for OPS 2	DDE	Meeting 9 26-27/06/2007	o
42.	7 24-25/04/2007	Prepare WP on OM template for small operations	JTP	Meeting 8 15-16/05/2007	c
43.	7 24-25/04/2007	Follow-up on MAPS	DDE	Meeting 8 15-16/05/2007	c
44.	7 24-25/04/2007	Review FTL text	RRO	Meeting 8 15-16/05/2007 Meeting 9 26-27/06/2007	o
45.	8 15-16/05/2007	Reflect subgroup discussions in	RRO	asap	o

No.	Meeting No. / Date	Task	Resp.	Timeframe	Status
		Certification WP			
46.	8 15-16/05/2007	Develop RIA of Certification WP further	all	Meeting 9 26-27/06/2007	o
47.	8 15-16/05/2007	Follow up on cabin crew discussions	DDE/ BLE	Meeting 9 26-27/06/2007	o
48.	8 15-16/05/2007	Review and develop descriptions for OM template	all, as allocated by JTP	Meeting 9 26-27/06/2007	o
49.	8 15-16/05/2007	Review Subpart N WP and provide comments	all	before end of May	o

DDE
16/05/2007